

1. The parties shall serve initial disclosures by September 30, 2022.
2. All requests for documents and interrogatories pursuant to Local Civil Rule 33.3(a) shall be served by October 31, 2022..
3. All non-expert discovery shall be commenced in time to be completed by March 31, 2023.
4. Plaintiff shall disclose expert evidence as required by Rule 26(a)(2)(A), (B) or (C), including the identities and reports of experts, if any, by April 28, 2023. Defendant shall disclose expert evidence in response by May 26, 2023.
5. Depositions of experts shall be completed by June 15, 2023.
6. Any motion for summary judgment is returnable before Judge Abrams, shall accord with her Individual Practices and shall be filed by July 10, 2023.
7. The parties shall write to the Court as soon as both sides are prepared to engage in settlement discussions.

8. All discovery (including requests for admission and any applications to the Court with respect to the conduct of discovery) must be initiated in time to be concluded by the deadline for all discovery. Any application for an extension of the time limitations herein must be made as soon as the cause for the extension becomes known to the party making the application and in accordance with this Court's Individual Practices. Any application not in compliance with this paragraph will be denied. To the extent a party expects to produce electronically stored information, the parties shall promptly discuss the protocols for the search and review of such material.
9. All applications to the Court must comply with this Court's Individual Practices, which are available through the Clerk's Office or at: <https://nysd.uscourts.gov/hon-gabriel-w-gorenstein> . Discovery applications -- that is, any application or motion pursuant to Rules 26 through 37 or 45 -- not only must comply with ¶ 2.A. of the Court's Individual Practices but also must be made promptly after the cause for such an application arises. In addition, absent extraordinary circumstances no such application will be considered if made later than 30 days prior to the close of discovery. Untimely applications will be denied.

SO ORDERED.

Dated: New York, New York
August 30, 2022

SO ORDERED:



GABRIEL W. GORENSTEIN
United States Magistrate Judge